

UNITED STATES DISTRICT COURT
for the

Southern District of Texas

JAN 13 2020

David J. Bradley, Clerk of Court

United States of America
v.
Luis Antonio SELIS Vasquez

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Case No.

H20-0051W

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 12, 2020 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2252A(a)(1)	Any person who knowingly mails, or transports or ships using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including computer, any child pornography.

This criminal complaint is based on these facts:

See Attached

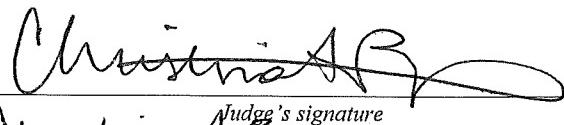
Continued on the attached sheet.


Laura J. Gill
Complainant's signature
Laura J. Gill, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/13/2020

City and state: Houston, Texas


Christine A. Bryan
Judge's signature
Peter Bray; U.S. Magistrate Judge
Printed name and title CWD

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I. Introduction:

Your Affiant, Laura J. Gill, being duly sworn, deposes and says:

A. Introduction and Agent Background:

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), assigned to the Office of the Special Agent in Charge, Houston, Texas. I have been employed by Immigration & Customs Enforcement (ICE), Homeland Security Investigations (HSI), as an HSI agent for approximately nine years. I am currently assigned to the Cyber Investigations Group (CIG), and as part of my daily duties as an HSI agent assigned to this group, I investigate criminal violations relating to child exploitation and child pornography including violations of Chapter 109A, Chapter 110 and Chapter 117, all contained within Title 18 of the United States Code. I have received training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review examples of child pornography in various forms of media including computer media. I have also participated in the execution of search warrants; a number of which involved child exploitation, child pornography and online solicitation offenses.
2. This affidavit is based on reports your affiant has read and conversations your affiant has had with law enforcement officers and investigators involved in this investigation. This affidavit does not set forth all of my knowledge in this matter, but is intended only to show that there is probable cause to believe Luis Antonio SELIS Vasquez is in violation of Title 18 USC 2252A(a)(1), anyone who knowingly mails, or transports or ships using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, any child pornography.
3. On January 12, 2020, the assigned duty agent with HSI Houston was contacted by Customs and Border Protection (CBP) Inspectors at George Bush Intercontinental Airport and informed that a Peruvian citizen, later identified as Luis Antonio SELIS Vasquez, was referred to secondary inspection. During the secondary inspection, child pornography

- videos were discovered on a silver Toshiba 3GB external hard drive belonging to SELIS.
4. CIG Special Agent (SA) Laura J. Gill, Airport Group SA Therese Renick, and Computer Forensics Agent (CFA) Richard Shanks responded to George Bush Intercontinental Airport. Upon arrival, CBP Supervisory Inspector Robert C. Spooner and CBP Inspector Josue Garcia advised the special agents of the information obtained while conducting the primary and secondary inspection of SELIS as part of SELIS' request for admission to the United States. The following is a summary of the information provided by CBP Supervisory Inspector Spooner and CBP Inspector Garcia.
5. SELIS was referred to secondary inspection for further review of his request for admission to the United States.
6. SELIS admitted to Inspector Garcia that approximately four (4) months previously he had actively searched for young girls via the Internet. SELIS stated he had followed several links until he found a YouTube channel where he was able to watch sexually explicit videos and see sexually explicit photos of girls as young as 10 years old. SELIS stated he had previously downloaded and saved several of the videos and pictures but knew it was wrong, so he deleted them from his devices prior to leaving the United States for the winter break. SELIS stated he had retrieved and restored the deleted items prior to returning to the United States because he was still sexually interested in the child pornography.
7. SELIS informed Inspector Garcia that the restored images and/or videos could be located on his silver Toshiba 3TB external hard drive (Serial Number: 28RDTA1ZT4JG) and gave directions to the file paths.
8. SA Gill and SA Renick attempted to conduct an interview with SELIS with the assistance of Spanish speaking CBP Inspector Randy Romo. SA Gill provided a written copy of the *Miranda* rights to SELIS in the Spanish language to read while SA Gill read the *Miranda* rights to him in Spanish. SELIS stated he understood his rights as stated and signed the *Miranda* rights form waiving his right to an attorney and agreeing to answer questions. SELIS then stated he wanted an attorney. The interview was terminated immediately.

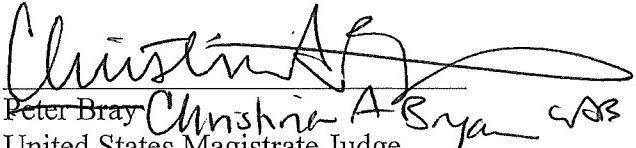
9. CFA Richard Shanks conducted a forensic preview of the Toshiba 3TB external hard drive bearing Serial Number 28RDTA1ZT4JG and located approximately 100 videos constituting child pornography. The videos were of children ranging from infants to teenagers. Three of the videos are as follows:
 - a. File [000020]-approximately 53 seconds in length: This video file depicts an infant male approximately 3 months of age, lying on his back, wearing a white and grey striped shirt, naked from the waist down, drinking from a bottle while an adult female orally penetrates his penis.
 - b. File [000082]-approximately 9 minutes and twenty-six seconds in length: This video depicts a Caucasian prepubescent female approximately 11 to 13 years of age, fully nude on a bed with a fully nude Caucasian adult male. The prepubescent female performs oral sex on the adult male's erect penis prior to him rubbing petroleum jelly on her anus. The adult male digitally penetrates the prepubescent female's anus prior to instructing her to digitally penetrate her anus while manually stimulating her vagina. The adult male penetrates the prepubescent female's anus. The adult male then ejaculates on the prepubescent female's buttocks and vagina. The prepubescent female is a known and identified victim.
 - c. File 2_5289665778834997675-approximately 17 minutes and 3 seconds in length: This video file depicts an Asian prepubescent female approximately 5 to 8 years of age, fully nude. The prepubescent female is forced to perform oral sex on an adult Asian female's vagina and anus and to penetrate the adult female's vagina with her fingers. A Caucasian adult male then penetrates the prepubescent female with his fingers, a black vibrator, and his penis. The adult male makes the prepubescent female perform oral sex on his erect penis.

10. Due to the information set forth above, your affiant believes there is probable cause to believe on or about January 12, 2020, SELIS was in violation of 18 USC 2252A(a)(1), Transporting Child Pornography in Interstate or Foreign Commerce.



Laura J. Gill
Special Agent
Homeland Security Investigations

SUBSCRIBED and SWORN
Before me this 13th day of January 2020 and I find probable cause.



Peter Bray Chinshir A. Bryan c/s
United States Magistrate Judge
Southern District of Texas